1	ELECTRONIC FRONTIER FOUNDATION CINDY COHN (145997)		
2	cindy@eff.org LEE TIEN (148216)		
3	tien@eff.org KURT OPSAHL (191303)		
4	kurt@eff.org		
5	KEVIN S. BANKSTON (217026) bankston@eff.org		
6	CORYNNE MCSHERRY (221504) corynne@eff.org		
7	JAMES S. TYRE (083117) jstyre@eff.org		
	454 Shotwell Street		
8	San Francisco, CA 94110 Telephone: 415/436-9333		
9	415/436-9993 (fax)		
10	Attorneys for AT&T Class Plaintiffs and Co- Chair of Plaintiffs' Executive Committee		
11 12	[Additional counsel appear on signature page.]		
	UNITED STATES	DISTRICT COUR	T
13	FOR THE NORTHERN D	DISTRICT OF CAL	IFORNIA
14	SAN FRANCI	ISCO DIVISION	
15	IN RE NATIONAL SECURITY AGENCY) MDL Docket	No 06-1791 VRW
16	TELECOMMUNICATIONS RECORDS) CLASS ACT	TON
17	LITIGATION, MDL No. 1791)	
18	This Document Relates To:) STIPULATIO	ON
19	HEPTING, et al. v. AT&T CORP., et al. (Dkt No. 06-0672)) Courtroom:) Judge:	6, 17th Floor The Hon. Vaughn R. Walker
20			
21			
22			
23)	
24		_)	
25			
26			
27			
28			

No. 3-06-0672-VRW

1		<u>RECITALS</u>
2	A. Plain	tiffs and Defendant AT&T Corp. ("AT&T") previously agreed to file public
3	redacted versions of	f certain documents under seal in this matter. See, e.g., Docket Entries 147 and
4	277.	
5	B. Plain	tiffs and AT&T have now come to further agreement on making additional
6	information publicly	y available in this Court's docket.
7		STIPULATION
8	1. Plain	tiffs and AT&T, by and through their respective attorneys of record, hereby
9	stipulate that the fol	lowing documents may be unsealed in this Court's docket:
10	a	. Declaration of Mark Klein (Dkt. No. 230)
11	b	. Declaration of Mark Klein (Dkt. No. 230), Exh. A, pp. 1, 4, Exh. B, pp. 6
12		20, and Exh. C, pp. 1, 3, 45-6
13	c.	. Declaration of J. Scott Marcus (Dkt. No. 231)
14	d	. Declaration of J. Scott Marcus (Dkt. No. 231), Exh. L-P and Exh. U
15	2. Plain	tiffs and AT&T further stipulate that Plaintiffs may file public versions, or in
16	some cases public re	edacted versions, of the documents identified in paragraph 1 above and attached
17	hereto as Exhibits 1-	-4, with this Court.
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		

TIDLIL A TION

No. 3-06-0672-VRW

l		
2		
3	DATED: September 25, 2007	ELECTRONIC FRONTIER FOUNDATION
4	DATED. September 23, 2007	De-
5		By /s/ Cindy A. Cohn Cindy A. Cohn, Esq. (SBN 145997)
6		Lee Tien, Esq. (SBN 148216) Kurt Opsahl, Esq. (SBN 191303) Kevin S. Bankston, Esq. (SBN 217026)
7		Corynne McSherry, Esq. (SBN 221504) James S. Tyre, Esq. (SBN 083117)
8		454 Shotwell Street San Francisco, CA 94110
9		Telephone: (415) 436-9333 x108 Facsimile: (415) 436-9993
10		ATTORNEYS FOR AT&T CLASS
11		PLAINTIFFS AND CO-CHAIR OF PLAINTIFFS' EXECUTIVE COMMITTEE
12		Additional Plaintiffs' Counsel on Executive
13		Committee and Liaison Counsel:
14		
15	DATED: September 25, 2007	By /s/ Jacob R. Sorensen Bruce A. Ericson
16		Bruce A. Ericson David L. Anderson
17		Jacob R. Sorensen Marc H. Axelbaum
18		PILLSBURY WINTRHOP SHAW PITTMAN LLP
19		50 Fremont Street Post Office Box 7880
20		San Francisco, CA 94120-7880
21		David W. Carpenter Bradford A. Berenson
22		David L. Lawson Edward L. McNicholas
23		SIDLEY AUSTIN LLP 1501 K Street, N.W.
24		Washington, DC 2005
25		ATTORNEYS FOR AT&T CORP. and AT&T INC.
26		
27		
28		

<u>-2-</u>

1		
2	ROGER BALDWIN FOUNDATION OF	LERACH COUGHLIN STOIA GELLER
2	ACLU	RUDMAN & ROBBINS LLP
3	HARVEY GROSSMAN ADAM SCHWARTZ	ERIC ALAN ISAACSON
	180 North Michigan Avenue	655 West Broadway, Suite 1900 San Diego, CA 92101-3301
4	Suite 2300	Telephone: (619) 231-1058
5	Chicago, IL 60601	Facsimile: (619) 231-7423
3	Telephone: (312) 201-9740	
6	Facsimile: (312) 201-9760	ATTORNEYS FOR AT&T CLASS
7	, ,	PLAINTIFFS AND PLAINTIFFS' LIAISON
7	PLAINTIFFS' COUNSEL FOR AT&T	COUNSEL
8	SUBSCRIBER CLASS AND CO-CHAIR OF	
0	PLAINTIFFS' EXECUTIVE COMMITTEE	
9	LERACH COUGHLIN STOIA GELLER	LIEFF, CABRASER, HEIMANN &
10	RUDMAN & ROBBINS LLP	BERNSTEIN, LLP
	REED R. KATHREIN	ELIZABETH J. CABRASER
11	JEFF D. FRIEDMAN	BARRY R. HIMMELSTEIN
12	SHANA E. SCARLETT	MICHAEL W. SOBOL
	100 Pine Street, Suite 2600	ERIC B. FASTIFF
13	San Francisco, CA 94111 Telephone: (415) 288-4545	275 Battery Street, 30th Floor San Francisco, CA 94111-3339
14	Facsimile: (415) 288-4534	Telephone: (415) 956-1000
	1465111116. (112) 200 123 1	Facsimile: (415) 956-1008
15	ATTORNEYS FOR AT&T CLASS	•
16	PLAINTIFFS AND PLAINTIFFS' LIAISON	PLAINTIFFS' COUNSEL FOR MCI
10	COUNSEL	SUBSCRIBER CLASS
17	MOTLEY RICE LLC	GEORGE & BROTHERS, L.L.P.
18	RONALD MOTLEY	R. JAMES GEORGE, JR.
10	DONALD MIGLIORI	DOUGLAS BROTHERS
19	JODI WESTBROOK FLOWERS	1100 Norwood Tower
20	JUSTIN KAPLAN	114 W. 7th Street
20	28 Bridgeside Boulevard	Austin, Texas 78701
21	P.O. Box 1792	Telephone: (512) 495-1400
22	Mt. Pleasant, SC 29465 Telephone: (843) 216-9163	Facsimile: (512) 499-0094
22	Facsimile: (843) 216-9680	PLAINTIFFS' COUNSEL FOR CINGULAR
23		SUBSCRIBER CLASS
24	PLAINTIFFS' COUNSEL FOR VERIZON	
24	SUBSCRIBER CLASS AND	
25	MISCELLANEOUS SUBSCRIBER	
	CLASSES	
26		
27		
28		

-3-

1 2 3 4 5 6	THE MASON LAW FIRM, PC GARY E. MASON NICHOLAS A. MIGLIACCIO 1225 19th St., NW, Ste. 500 Washington, DC 20036 Telephone: (202) 429-2290 Facsimile: (202) 429-2294 PLAINTIFFS' COUNSEL FOR SPRINT SUBSCRIBER CLASS	MAYER LAW GROUP CARL J. MAYER 66 Witherspoon Street, Suite 414 Princeton, New Jersey 08542 Telephone: (609) 921-8025 Facsimile: (609) 921-6964 PLAINTIFFS' COUNSEL FOR BELLSOUTH SUBSCRIBER CLASS
7 8 9 10 11 12 13 14 15	BRUCE I AFRAN, ESQ. 10 Braeburn Drive Princeton, NJ 08540 609-924-2075 PLAINTIFFS' COUNSEL FOR BELLSOUTH SUBSCRIBER CLASS KRISLOV & ASSOCIATES, LTD. CLINTON A. KRISLOV W. JOEL VANDER VLIET 20 North Wacker Drive Suite 1350 Chicago, IL 60606 Telephone: (312) 606-0500 Facsimile: (312) 606-0207	LISKA, EXNICIOS & NUNGESSER ATTORNEYS-AT-LAW VAL PATRICK EXNICIOS One Canal Place, Suite 2290 365 Canal Street New Orleans, LA 70130 Telephone: (504) 410-9611 Facsimile: (504) 410-9937 PLAINTIFFS' COUNSEL FOR BELLSOUTH SUBSCRIBER CLASS
17	PLAINTIFFS' COUNSEL FOR BELLSOUTH SUBSCRIBER CLASS	
18		THE LAW OFFICES OF STEVEN E.
19 20		SCHWARZ, ESQ. STEVEN E. SCHWARZ
21		2461 W. Foster Ave., #1W Chicago, IL 60625 Telephone: (773) 837-6134
22		PLAINTIFFS' COUNSEL FOR BELLSOUTH
23		SUBSCRIBER CLASS
24		
25		
26		
27		
28		

-4

No. 3-06-0672-VRW

1	<u>CERTIFICATE OF SERVICE</u> I hereby certify that on September 25, 2007, I electronically filed the foregoing with the	
2	Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-	
3	mail addresses denoted on the attached Electronic Mail Notice List.	
4		
5	By /s/ Cindy A. Cohn	
6	By <u>/s/ Cindy A. Cohn</u> Cindy A. Cohn, Esq. (SBN.145997) ELECTRONIC FRONTIER FOUNDATION	
7	454 Shotwell Street San Francisco, CA 94110	
8	Telephone: (415) 436-9333 x108 Facsimile: (415) 436-9993	
9	cindy@eff.org	
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		